

Appendix E Comments Received on ICMP Document

Federal Comments Received on 2010 Draft ICMP Document



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chicago Ecological Services Field Office
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Phone: (847) 381-2253 Fax: (847) 381-2285



IN REPLY REFER TO:
FWS/AES-CIFO/

April 7, 2010

Mr. Todd Main
Illinois Department of Natural Resources
160 N. LaSalle St., Suite 700
Chicago, Illinois 60601

Dear Mr. Main:

This responds to your email (dated March 16, 2010) requesting review of the Illinois Department of Natural Resources' (IDNR) draft planning document for the establishment of the Illinois Coastal Management program (ICMP). The draft ICMP was developed in accordance to the Federal Coastal Zone Management Act (CZMA).

The draft ICMP defines the coastal zone boundary within Illinois. ICMP Goals include enhancing the state's role in supporting and coordinating partnerships among stakeholder agencies and organizations, facilitating a shared vision for enhancing the Illinois coastal zone among these stakeholders, and leveraging draft ICMP and other funds to maximize the impact of local projects. In doing so, the draft ICMP identifies several initial priorities. Our review of, and comments on, the draft ICMP focuses on areas of potential benefit to, and effects on, the Service's trust resources (interjurisdictional fishes and other aquatic resources, migratory birds, and federally endangered and threatened species), as well as related issues that have required our past/continued involvement in the coastal zone.

Definition of Coastal Zone Boundaries. The ICMP's proposed Coastal Zone Boundaries are comprehensive in addressing issues in both the immediate/near-shore coastal zone, as well as more inland factors (e.g., urbanization, ravine/stream degradation) that may affect the Lake Michigan basin.

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The CZMA requires that federal facilities and lands held by the federal government be excluded from the boundaries of the ICMP. This does not preclude the state from partnering with such facilities on projects that may be beneficial to the coastal zone, though federal funding to the state for coastal projects may not be spent on federal facilities. The largest single federal facility within the proposed Illinois Coastal Zone boundary is the nearly 1600 acre Naval Training Center, Great Lakes (NTCGL). In the past, IDNR and the Service have been involved in regular reviews of NTCGL's Integrated Natural Resource Planning Process, as required by the Sikes Act. NTCGL includes some coastal fish and wildlife habitat of interest to both IDNR and the Service, including dune and swale nesting habitat for colonial waterbirds, and coastal ravines. In addition, the GLNTC harbor is known to have unresolved environmental contaminants issues that may be affecting colonial waterbirds and other aquatic resources. The exclusion of federal facilities from the proposed Coastal Zone boundaries may render these issues beyond the scope of the ICMP. Nevertheless, we note that these issues are still clearly tied to the greater Illinois coastal zone, and we thus urge IDNR to continue to work with the Service and the Navy through the Sikes Act process to more aggressively identify and implement measures to improve habitat and environmental conditions for fish, wildlife, and aquatic resources within the boundaries of NTCGL.

Coastal Erosion Assessment and Planning. The ICMP identifies the control of coastal erosion as a major priority. As you know, past attempts to reverse the effects of beach erosion along the Illinois coastline has been controversial due to ongoing concerns about asbestos and other contaminants raised by citizens groups. The Lake Michigan Coastal Zone includes habitat for several federally threatened or endangered species, including the Great Lakes piping plover (*Charadrius melodus*), Pitcher's thistle (*Cirsium pitcheri*), and eastern prairie fringed orchid (*Platanthera leucophaea*). Continuing erosion and loss of coastal habitat, especially at Illinois Beach State Park, will lead to further uncertainty about the future of these species in Illinois. We support any future planning efforts to halt and reverse the losses of coastal habitat thus far. However, we also recognize that doing so will require the input of multiple State and Federal agencies, as well as citizen stakeholder groups. Adoption of the ICMP may be one more step to ensure that such efforts continue.

Stream Connectivity and Fisheries. Many of Illinois streams that are within the Lake Michigan Drainage are either impaired due to pollution, erosion, and altered hydrology, or now include impediments to inland passage by fish coming from Lake Michigan. We support IDNR's efforts to work with other stakeholder agencies (e.g., municipalities and federal agencies such as the US Army Corps of Engineers) to improve stream function and water quality within the Lake Michigan Drainage, and believe that the ICMP will further facilitate such initiatives.

Threatened & Endangered Species and Migratory Birds. As noted above portions of the Illinois Coastline provide habitat for several threatened or endangered species. Within protected habitat (e.g., Illinois beach State Park), these species will likely benefit most from continued management of occupied habitat and efforts to halt or reverse the effects of coastal erosion.

In some cases additional steps to protect listed species should also be considered. Of particular concern is the recent (in 2009) nesting of a pair of Great Lakes piping plovers in

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Illinois, the first such nest in over 30 years. The nest was located on private land just south of Illinois Beach State Park, and within federally Designated Critical Habitat (DCH) for the species. The Illinois Unit of plover DCH includes roughly 1500 acres of coastal habitat, most of which is within Illinois Beach State Park. One of the key requirements needed by piping plovers in order to nest is beach habitat that is free of disturbance from humans or their dogs using the beaches. However, much of the beach front within plover DCH in Illinois is open to public recreation. This includes sections that are otherwise owned by private interests (e.g., Johns Manville Corp., or Midwest Generation in Waukegan), but where the public has unrestricted beach access up to the high water mark. In some cases, unrestricted public access to beaches in the coastal zone can cause resource related, and other conflicts. For example, the Service has (for several years) discussed with Midwest Generation whether they could take steps to extend protection (e.g., through fencing) into potential plover DCH along their section of beach. While they have expressed interest in this (due in part to unrelated security concerns resulting from public access so near a major power generating plant), Midwest Generation staff have stated that the biggest limiting factor to them protecting beach habitat is that the beach is considered public. Nevertheless, the draft ICMP states (Chapter 5, p. 2) that even beaches in the public domain do not necessarily require unrestricted public access. We suggest that implementation of the ICMP should consider whether there are sections of beach within the DCH where additional protection could be extended to include times when plovers are likely to be present or nesting (April through August).

In addition to piping plovers, Illinois' section of Lake Michigan Coastline is an important flyway for migratory birds. As the coastal zone is increasingly considered for new development (e.g., wind power), we urge IDNR to use components of the ICMP to consider migratory birds to the extent possible in future planning, and to also encourage bird-friendly practices along the coast in general.

Bi-State Conservation in Two Resource-Rich Coastal Areas. Along Illinois' coastal zone, there are two areas with high concentrations of resource-rich natural areas that stand out from the rest. These include: A) Illinois Beach, Spring Bluff Nature Preserve, and other coastal natural areas north of Waukegan in northern Lake County, and B) The Wolf Lake, Lake Calumet, Burhman Prairie, and Powderhorn Lake complex in southeast Cook County. Both of these complexes include adjacent open space and shared resource issues just over the state lines in Wisconsin and Indiana. For example, along the Illinois-Wisconsin State Line, wetland hydrology of Chiwaukee Prairie (Wisconsin) is shared by the adjacent Spring Bluff Nature Preserve (Illinois). The Service has in the past been involved in efforts to plan bi-state approaches to addressing threats common to both sides of the state line. Nevertheless, it has been difficult at times to facilitate close working relationships between counterparts in the two states, even when Federal funding sources (which would not be restricted to being spent in only one of the two states) were available to assist. Once finalized, we encourage IDNR to use the ICMP to facilitate greater bi-state cooperation whenever there are shared resource interests with other states, whether at adjacent sites or common to Lake Michigan itself.

Environmental Contaminants. As the draft ICMP notes there are a number of sites along the Lake Michigan Coastline that are known to have high concentrations of environmental

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contaminants. We support the ICMP's "site-specific approach" to cleaning up areas with high concentrations of environmental contaminants, as well as its extensive planning for addressing non-point sources of pollution.

Thank you for the opportunity to comment on the Draft ICMP. If you have questions regarding our comments, my staff contact for the ICMP is Mr. Mike Redmer (Phone: 847/381-2253 ext. 16; Email: Mike_Redmer@fws.gov).

Sincerely,

A handwritten signature in black ink that reads "Cathy Pollack". Below the name, the word "acting" is written in a smaller, cursive script.

Janice C. Engle
Field Supervisor



COMMANDANT
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593
Staff Symbol: CG-0942
Phone: (202) 372-3800
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April 16, 2008

Dear Coastal Program Manager:

The US Coast Guard is committed to cooperating with your office, other states, and the NOAA/OCRM to maintain the long-term vitality of our coastlines. Your office has developed comprehensive programs to manage impacts to coastal resources, and the Coast Guard strives to ensure that activities it oversees are consistent to the maximum extent practicable with the enforceable policies of your federally approved program.

The Coast Guard promulgates hundreds of routine and frequent maritime regulations all across the US. These include:

1. Regattas and Marine Parades - organized water events of limited duration that are conducted according to a prearranged schedule under 33 C.F.R. § 100. These regulations help ensure safe navigation.
2. Anchorages - areas defined by geographic coordinates expressed in degrees of latitude and longitude under 33 C.F.R. § 110. These areas help ensure safe navigation.
3. Regulated Navigation Areas - water areas within a defined boundary for which vessel navigation regulations have been established under 33 C.F.R. § 165. These areas help ensure safe navigation by alerting mariners to hazardous areas.
4. Drawbridge Operation Regulations - operation of drawbridges across the navigable waters under 33 C.F.R. § 117. These regulations describe safe bridge operation and vessel navigation and also determine drawbridge operations during periods of maintenance repair.
5. Limited Access Areas - areas which may be either safety zones or security zones under 33 C.F.R. § 165. They may be a water area and/or shore area where access is limited to authorized persons, vehicles, or vessels. A safety zone may be stationary and described by fixed limits or it may be described as a zone around a vessel in motion.
6. Security Zones - areas of land and/or water designated by a Captain of the Port or District Commander to prevent damage or injury to any vessel or facility or water of the US.

Following a thorough review, my office believes that these routine and frequent regulations are consistent with the enforceable policies of existing state coastal zone management plans. The Coast Guard seeks a General National Consistency Determination (GCD) for these actions under 15 C.F.R. §§ 930.36(c) and (e). These qualify as either repetitive actions that may have incremental cumulative effects, but do not have coastal effects when performed separately or

they qualify as *de minimis*. A GCD is the most efficient way to address CZMA consistency for the activities described above.

At this time the Coast Guard requests that you provide the following:

1. A description of coastal effects these activities will cause in your state;
2. A list of the specific enforceable policies that apply to these coastal effects;
3. A description of any thresholds you might consider to allow a GCD if the activity falls below such thresholds; and
4. Any questions, concerns, comments that you may have on this proposal.

LT Frank Nolan from my office will be the point of contact for this project; he can be reached at frank.g.nolan@uscg.mil or (202) 372-3800. The Coast Guard looks forward to working with you to improve the efficiency of the CZMA compliance system.

Sincerely,



THOMAS M. HAYES, III
Chief, Office of Environmental and Real Property Law
U.S. Coast Guard



Commander
Ninth Coast Guard District (dl)

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5090
April 8, 2010

Illinois Department of Natural Resources
Attn: Mr. Todd Main, ICMP Program Manager
160 North LaSalle Street, Suite 700
Chicago, IL 60601

Dear Mr. Main:

On behalf of the United States Coast Guard's (USCG) Ninth District legal office and the Environmental Compliance Section of the USCG's Civil Engineering Unit (CEU) Cleveland, this letter is offered in response to your request for comments regarding the prospective Illinois Coastal Management Program (ICMP).

Enclosure (1) addresses three of the lists contained in chapter 11 of the ICMP Program Document (PD). First, enclosure (1) touches on the general list of federal activities that Illinois proposes are in the national interest. Second, it discusses the list of federal agency activities that Illinois proposes to be subject to a consistency determination under the Coastal Zone Management Act (CZMA). Finally, enclosure (1) takes up the list of federal licensed and permitted activities that Illinois proposes to begin reviewing.

Please, feel free to contact me or Mr. Frank Blaha, frank.a.blaha@uscg.mil, if you want to discuss further.

Sincerely,

MICHAEL C. PETTA
Lieutenant, U.S. Coast Guard
Judge Advocate
Ninth Coast Guard District

Enclosure: (1) USCG Comments on Illinois' Proposed Coastal Management Program

Copy: Commandant (CG-0942)
CG CEU Cleveland

COMMENTS ON ILLINOIS* PROPOSED COASTAL MANAGEMENT PROGRAM

*Submitted by the USCG's Ninth District Legal Office and the Environmental Compliance Section
of the USCG's Civil Engineering Unit Cleveland*

1) Federal Activities with a National Interest

In the Illinois Coastal Management Program (ICMP) Program Document (PD), you requested our input regarding the list of federal activities that are in the national interest. The PD asks whether there are any additional *general areas* and whether there are any *specific sites or issues* to be included on the list. As it now stands, the list is quite broad and encompasses the vast majority, if not the entirety, of USCG general mission areas. Thus, we see no need to add any general areas. As for specific sites or issues, federal efforts to keep Asian carp from Lake Michigan or to refine ballast water discharge regulations certainly are activities of current and significant national interest. Both seem to be covered, however, under your list's topic heading "invasive species." Thus, we see no reason to explicitly mention either of those specific issues or any others for that matter.

2) Federal Activities Subject to Consistency Determinations

Also in the PD, you asked for input on the list USCG activities subject to a consistency determination. Below, we offer comments in two areas: (1) regulated navigation areas, safety zones, and security zones and (2) hazardous substance and material pollution response and planning.

Regulated Navigation Areas, Safety Zones, and Security Zones

Currently, your PD states that a federal consistency determination is required for each regulated navigation area (RNA), safety zone, or security zone that the USCG establishes. Doing so would likely prove burdensome for us and for Illinois because the USCG establishes many RNAs, safety zones, and security zones within or near your coastal zone. Last year, for example, we put 55 safety zones in place just around fireworks displays at the Chicago Navy Pier. To avoid the potential burden of having to go through the consultation process for each and every RNA, safety zone, and security zone, we recommend two changes to your ICMP.

One way that we can prevent burdening either of our agencies is to categorize certain RNAs, safety zones, and security zones as *de minimis* activities under 15 CFR § 930.33. Categorizing an activity as *de minimis* means that activity is not subject to the consistency review process. According to 15 CFR § 930.33(a)(3)(ii), a *de minimis* activity is one "expected to have insignificant direct or indirect (cumulative and secondary) coastal effects..." We expect that any RNA, safety zone, or security zone lasting one week or less in duration will have such insignificant effects and thus, seek your concurrence that these particular activities are indeed *de minimis*.

A second change we recommend is removing RNAs, safety zones, and security zones completely from your list of activities subject to consistency determinations. As you know, this will not relieve the USCG from its responsibilities under the CZMA. Instead, it will allow the USCG to determine for each RNA, safety zone, and security zone whether we

should submit to Illinois a negative determination under 15 CFR § 930.35 or a consistency determination under 15 CFR § 930.36. While this change will not necessarily reduce the burden on our agencies, it will allow us on a case by case basis to decide which regulatory process is the most appropriate for any particular situation.

In sum, we recommend two changes regarding RNAs, safety zones, and security zones. First, categorize those RNAs, safety zones, and security zones of one week or less as *de minimis*. Second, do not list RNAs, safety zones, and security zones on your list of activities subject to consistency determinations. If you implement these two changes, the practical effect will be that the USCG will provide a negative determination or a consistency determination to Illinois for any RNA, safety zone, or security zone that we establish for more than one week. We estimate that these changes will avoid unnecessary review for both our agencies and focus our efforts in those cases where review is appropriate.

Hazardous Substance and Material Pollution Response and Planning

Currently, your PD states that a federal consistency determination is required for any USCG planning for or response to the release of oil or some other hazardous substance or material under CWA, OPA, or CERCLA. While we do not disagree that such USCG *response* actions might require a consistency determination under the CZMA, it is not clear to us for what specific *planning* activities would require a consistency determination. Consequently, we recommend leaving pollution *response* actions on the list but removing pollution response *planning*. Making this change simply means that USCG pollution response will almost always be subject to a consistency determination but pollution response planning will be assessed on a case by case basis.

Although USCG pollution *response* might generally be subject to consistency determinations, we draw your attention to the very real possibility that in some response cases the USCG might "deviate from full consistency when such deviation is justified because of an emergency or other similar unforeseen circumstance ('exigent circumstance')." See 15 CFR § 930.32(b). In such cases, we will consult with Illinois to the extent that the exigent circumstances allow.

3) Federal Licenses or Permits Subject to Consistency Certification

Along with the national interest list, and the federal activities list, the ICMP PD lists USCG marine event permits as a type of permit subject to state review. In our opinion, including *all* marine event permits on this list will create an unnecessary burden on the USCG and Illinois. This is because the USCG receives dozens of marine event permits each year, many of which are for relatively minor activities. In 2009, we received nearly 100 marine event permits just for the Chicago area. Conducting the review process contained in 15 CFR §§ 930.56 through 930.60 for each and every marine permit will likely create excessive and unnecessary work. Therefore, we recommend categorizing any marine event of one week or less in duration as a "minor activity" in accordance with 15 CFR § 930.53(b). As with our *de minimis* recommendation discussed above, we estimate that treating marine events of one week or less in duration as a "minor activity" will avoid unnecessary review for both our agencies.

Response to Public Comments Received at 2011 ICMP Public Hearing

What is the deadline for public comments?

-We will be accepting comments through the end of the month.

What kind of outreach is being done to municipalities on the coastline in request for support?

-The CAG has regional representation by all the municipalities within the coastal zone. Regional representation may be from a department, park district, commission, or the community, subject to approval of the municipalities.

What amount of funding was included in the President's FY 2012 budget for coastal funding for NOAA?

-66 million dollars, 2 million less than FY 11

Any idea how funding for local projects will break down within the program?

-A vast majority will be going into grants. Proposals will first go to the CAG, then on to the TAC, then to the Director of IDNR for final approval.

Would state projects compete with these local projects?

-We don't anticipate state competition with local projects rather a cooperative relationship where the state likely partners with local groups.

Have we already established the CAG?

-Yes. If you are interested in participating on the CAG, let us know.

Will there be more than one CAG?

-There is one Citizens Advisory Group.

Can you tell us more on how the CAG will interface with the TAC?

-The Coastal Advisory Group (CAG) will be the forum for broad public input. The CAG will form topic specific sub committees, to meet on a monthly basis or as necessary. The CAG makes recommendations which will provide better direction and implementation of the ICMP. The Technical Advisory Committee (TAC) will review, and provide comment on the project recommendations received from the CAG.

Additionally, how will they communicate ideas to one another?

-The CMP staff will facilitate the discussions between the groups.

I am assuming local communities will need to have match. What will the process be for assisting communities in coming up with match?

-We have IDNR staff who are very experienced with developing match, and will help communities.

Has there been any consideration in acquiring the land being decommissioned currently separating the North and South Units of the Illinois Beach State Park?

-IDNR has no plan to take on the land separating the north and south units of Illinois Beach State Park. There are many questions about the future risk/liability (environmental, financial and other) of decommissioning. Illinois Beach State Park currently routinely deals with previous land uses surrounding the site.

Does the CAG have its own website?

-No. However, a list of participants and functions can be found in chapter 7 of our program document.

Is there a specific reference number to a specific grant under which IDNR is making to NOAA?

-No this is a program approval process and will go through public hearings etc.

You all mentioned the NEPA process, an Environmental Assessment, and an Environmental Impact Statement. Can you explain which comes first and what is the timeline for completion of the EIS?

-Environmental Assessment comes first. Environmental Impact Statements evaluate the environmental impacts of appropriate Federal actions. A Draft EIS fully evaluates the impacts of the action and reasonable alternatives. Once the Draft is completed, it must be filed with the Environmental Protection Agency and be circulated for public comment for 45 days. A Final EIS responds to comments, including any project changes. The Final EIS must be filed with the EPA and be circulated for comment for 30 days. We hope to get the draft EIS as soon as possible.

Comment: The Illinois Coastal Management Program has been a long time coming and I could not be more excited to be here today and witness this momentous occasion. It is certainly a victory.

The presentation mentioned grant opportunities for wetland protection, but not habitat restoration and other opportunities. Please elaborate.

-Habitat restoration would certainly qualify for funding.

Comment: I would like to issue my congratulations to the Illinois Coastal Management Program, and raise a new issue. Our mission is to protect the lakes and develop policies to protect equality. That being said, have we looked at the combined disposal facility at Iroquois Landing? I think it is important that we draw all parties together for discussion as the IEPA permit is up this fall. We need to work together and look for the best solution.

Comment: Back in the 70s, there was an issue when it came to getting agencies together to permit, I would be interested in seeing how we can streamline this process.

-One of the priorities for the program is to help streamline the processes where appropriate and provide efficiencies.

Comment: In regards to the permit process, the joint permit between the USACE and the State has its pluses and minuses. It takes longer to process permits and the entire process gets bogged down and politicized. NOAA needs to come up with a plan to ameliorate.

Comment: In regards to the decommissioned land, the Zion Nuclear Power Plant, I know a portion of the property will be given up. I would like to see the process of bringing that land back to Illinois Beach State Park and reconnecting that land.

Comment: I would just like to say that I appreciate the technology and the efforts of this group, this has been a new way to participate in the public hearing, despite any technology issues.

Written Comments Received at 2011 ICMP Public Hearing

February 15, 2011

Dear Mr. Main,

I am submitting the comments of the United States Nuclear Regulatory Commission (NRC) staff on the draft State of Illinois Coastal Management Program document:

1. We recommend several revisions to the Zion nuclear power plant excerpt on pages 142-143 (Chapter 10). Please see the attached Word document; I used the track changes feature of Word to highlight our revisions.
2. The NRC is a Federal regulatory agency. The NRC issues licenses for the construction and operation of nuclear power plants and other related facilities (e.g., uranium enrichment facilities, uranium mining facilities, etc.), but does not itself construct, own or operate nuclear power plants and other related facilities. As such, I recommend that you delete the entry for the NRC under "Federal Agency Activities" on page 164 (Chapter 11).
3. With respect to the NRC entry for "Federal license or permit activities" on page 166 (Chapter 11), please add a reference to the Nuclear Waste Policy Act of 1982, 42 U.S.C. 10101 *et seq.* (I would also add the phrase "*et seq.*" after the citations to the Atomic Energy Act and the Energy Reorganization Act of 1974). In addition, please delete the reference to National Environmental Policy Act (NEPA). NEPA is a procedural, environmental planning statute applicable to all Federal agencies; it provides no specific, substantive authority to the NRC. The NRC's authority to license nuclear generating stations, fuel storage and processing centers is derived from the Atomic Energy Act, the Energy Reorganization Act of 1974, and the Nuclear Waste Policy Act of 1982.

If you have any questions, please contact me.

Andrew S. Pessin
Nuclear Regulatory Commission
OGC/RMR
(301) 415-1062
(301) 415-3725 (Fax)
Rm. O-14E16
Mail Stop: O-15D21

April 22, 2011

Dear Mr. Main:

As a follow up to our phone call last week, the Navy understands the Coastal Management Zone Act excludes federally-owned land from the statutory definition of a "coastal zone" that may be included in a state program, such as the Illinois Coastal Management Plan currently in development. As such, and to refine documents already published by the Illinois Coastal Management Program, NAVFAC Midwest (representing Naval Station Great Lakes) offers the following comments:

- 1) Our legal department wishes to change all published map verbiage from the current "Great Lakes Naval Training Center" to "Lands Controlled by the Federal Government," as we have multiple tenants, the Veterans Administration, and FBI located in the vicinity. Re-labeling the entire area as federal lands will still be accurate, but will avoid the need to separately designate each parcel.
- 2) We request that the language on the front page of the state website under their "Priorities" section and the "New Coast Guard" part on future CMZ brochures delete references to Great Lakes when discussing habitat, ecosystems and natural area restoration. However we would welcome notation that the Naval Station Great Lakes is actively partnering with state, local and federal stakeholders to improve habitat on federal lands consistent with their Navy functionality.
- 3) We propose the harbor area also be indicated as orange on Map 3 of 15 of the Coastal Zone Boundary maps (included within the lands controlled by the federal government) as shown on the attachment in yellow shading. The harbor was initially constructed by the Navy Circa 1905, and the federal government actively manages and controls this area as part of their training mission.
- 4) Illinois Coastal Management Program Coastal Zone Boundary Map 3 of 15 identifies "Downey Road" as crossing federal lands. This should be re-titled "Buckley Road". We recognize this may be a carry-over of an error on older FEMA maps published for Lake County.

We hope these comments are helpful to implementation of the Illinois Coastal Management Program.

Please call if I can be of assistance in any way. The Navy hopes to and intends to continue to actively participate in the formation of the CMZ and welcome opportunities to participate as they arise.

Thanks for the opportunity to participate.

Bruce G. Mack
Environmental Quality & Services Manager (EV-1) NAVFAC Midwest
(847) 688-2600 x 1-363
Bruce.G.Mack@Navy.mil

February 18, 2011

Todd Main
ICMP Program Manager
One Natural Resources Way
Springfield, IL 62702

Dear Mr. Main:

Friends of the Chicago River congratulates the Illinois Coastal Management Program team on the development of this important program and for putting together a process to organize and energize this effort.

The waterways that are the focus of this effort have made tremendous gains over the last three decades, but opportunities abound to improve water quality, provide habitat for our native plants and animals, and to provide opportunities for the people that live in, and visit, this region to recreate and interact with a magnificent natural resource.

Friends is excited to be a partner in the Illinois Coastal Management Program and we recognize the work of the program staff and the Alliance for the Great Lakes to undertake this effort. Friends is proud to be a part of such a diverse group of partners that is ready to utilize this effort to develop a shared vision for the protection, restoration and enhancement of our coastal resources. Friends, like our partners in this process, is eager to begin identifying sustainable innovative solutions that will ultimately realize the potential of these important waterways.

Sincerely,

John Quail

Director of Watershed Planning
Friends of the Chicago River

Alliance for the Great Lakes Comments
Angela Larsen, Coastal Project Manager

The purpose of my comments today are to briefly highlight the importance of the Coastal Management Program to the people, wildlife, and communities that live, work, and play on Illinois' coasts, and to focus attention on priority restoration activities and the positive impacts this will have on vital habitats and coastal communities.

Lake Michigan is a tremendous resource - it not only supplies 7 million people with drinking water but more than 20 million people depend on it for recreation, economy, and quality of life. It is no surprise that people, as well as wildlife, flourish on its shores. The variety of habitats within the Lake Michigan coastal area is greater than any other area of the state. Almost three-fourth of Illinois' threatened and endangered bird species are found here, and the coastal area contains the only high-quality beach habitat, and more than half the remaining high-quality prairie. There are many plant species, and entire plant communities, that exist only in this area.

However, our shoreline is also heavily urbanized and Illinois' remnant natural resources are under considerable stress. With an expected 20% increase in population by 2030 – the demand on Lake Michigan and its coasts will only increase, and those on the front line are Illinois' coastal communities. Local communities are close to their citizenry and vested with the responsibility to manage the land – they provide local expertise and context vital to any implementation effort. The Coastal Management Program provides a collaborative process and tools – in terms of technical support and funding – for coastal communities to balance ecosystem needs with the growing needs for recreation, public access, and appropriate waterfront development.

The Alliance for the Great Lakes is in a unique position to bridge the gap between “top-down” planning and on-the-ground and in-the-water habitat restoration and infrastructure projects. The Alliance's work is rooted in collaboration and engagement with our partners who range from individual volunteers, to local and county governments and civic groups, to regional, state and federal agencies. It is through these partnerships that the Alliance coordinates the Lake Michigan Watershed Ecosystem Partnership, a program originally organized and funded by IDNR. Through the Partnership, we support development of multi-jurisdictional projects and programs for land managers and owners in the Illinois Lake Michigan watershed that empower them to develop and implement restoration projects, and deliver measurable water quality, habitat, hydrologic and economic benefits for their communities, the Illinois Lake Michigan watershed, and ultimately Lake Michigan and the Great Lakes.

The Partnership's goals align with several Coastal Management Programs goals, specifically those related to the resource areas that merit special attention including: ravine restoration, improved recreational water quality impairments (aka beach closings), and control of nonpoint source pollution.

The Partnership, through its data collection efforts, prioritized the ravines as targets where restoration actions, such as stormwater detention, streambank stabilization and habitat improvement, should be concentrated. The ravines are a priority because: 1) they are unique, fragile and vulnerable natural habitats, and 2) once restored they could provide multiple benefits - including improved water quality,

reduction in nonpoint source pollution and enhanced species diversity. Many ravine mouths open onto recreational beaches and transport non-point source pollutants, such as sediments, nutrients and bacteria that impact the health of public swimming beaches and near-shore fisheries. Reducing urban runoff and non-point source pollution flowing through the ravines to Lake Michigan will result in positive environmental and economic effects, and we look forward to focus on these improvements in partnership with the CMP.

With the intense demand for water recreation, water quality and public health issues remain significant concerns in Illinois. Not only are beaches used for swimming, but the inland coastal waterways are increasingly used for boating, kayaking, and fishing. The Lake County Health Department and the Chicago Park District currently monitor for E. coli and other various air and water quality conditions in order to predict public health threats.

The Alliance, through our Adopt-a-Beach program, mobilizes more than 10,000 volunteers throughout the Great Lakes to collect data on pollution sources. We currently use this information to assist Illinois EPA to advise a TMDL for bacteria in Lake Michigan. In addition, we partner directly with local agencies like the Chicago Park District to enhance pathogen control efforts and encourage IDNR to make elimination of sources of beach pollution a priority under the CMP.

Even before the Coastal Management Program comes online, IDNR should be working with communities to identify potential sources for match. There are existing on-the-ground projects and funding proposals moving forward, but with little to no guidance on how these projects fit into or relate to the CMP funding priorities. We urge IDNR to begin an outreach effort that engages communities and partners throughout the CMP boundaries and provides direction for ongoing projects that can be used as CMP match – ideally the result will be a streamlined CMP application process.

As we plan for the future, the Alliance and the Ecosystem Partnership will look to the Coastal NPS program for technical assistance and funding to collect data and develop source reduction strategies. We agree that the focus, when appropriate, should be on incentives rather than mandates and regulations - technical assistance - related to local land use and zoning ordinances, management strategies, demonstration projects, and financial incentives - should be developed and coordinated with local communities and regional planning agencies.

Other future opportunities provided by the CMP include land acquisition and easements. The Open Space and Land Acquisition and Development Program and the Land and Conservation Fund are similar programs with similar objectives (natural resource conservation is a priority for both); both of these programs are managed through IDNR, and provide funding assistance for local government to acquire land, and develop outdoor recreation facilities. Another source of funding that will open up for state and local governments, is the Coastal and Estuarine Land Conservation Program (CELCP), it provides matching funds to purchase land, or conservation easements on such lands, from willing sellers. We ask that as IDNR develops and coordinates this program they continue to engage the Alliance and the Lake Michigan Watershed Ecosystem Partnership.

The Alliance and our partners look forward to the CMP program, and the tools and resources it will bring to assist with ravine restoration, water quality improvement, reduction of non-point source pollution and funding for land acquisition and easement opportunities. We look forward to our continued work with IDNR, the CMP program and Illinois' coastal communities.